Facility ID: 1431072596 Issuance type: Final State Permit To Operate

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In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

   (a) None.

2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

   (a) None.

A. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Carbon reactivation furnace w/ gas fired thermal incinerator followed by a scrubber (#1)	OAC 3745-31-05	0.29 lb/hr, 1.27 TPY PM 9.1 lbs/hr, 39.9 TPY S02 2.7 lbs/hr, 12.1 TPY NOx 0.2 lb/hr, 1.7 TPY HCl 0.39 lb/hr, 1.71 TPY HC 0.82 lb/hr, 3.6TPY CO Visible particulate emissions from any stack shall not exceed 5% opacity, as a six-minute average, except as specified by rule.
	OAC 3745-17-07(A)	Less stringent than the visible particulate emissions limit per OAC 3745-31-05.
	OAC 3745-17-11(A)	Less stringent than the PM emissions limit per OAC 3745-31-05.

2. **Additional Terms and Conditions**

   None

B. **Operational Restrictions**

1. No other fuel than natural gas shall be used to operate this emissions unit. A permit to install shall be applied for and obtained prior to any fuel change.

2. A monitoring device shall be installed in the water supply line to each scrubber that will shut down the regeneration systems in the event that the water supply to either scrubber fails.

3. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

4. The pressure drop across the scrubber shall be continuously maintained at a value of not less than 25 inches of water at all times while the emissions unit is in operation.

5. The scrubber water flow rate shall be continuously maintained at a value of not less than 312 gallons per minute at all times while the emissions unit is in operation.

C. **Monitoring and/or Record Keeping Requirements**

1. Continuous Opacity Monitoring - Certified Systems
   Statement of Certification

   A statement of certification of the existing continuous opacity monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

2. The permittee shall operate and maintain existing equipment to continuously monitor and record the opacity of the

particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

The permittee shall maintain records of all data obtained by the continuous opacity monitoring system including, but not limited to, percent opacity on an instantaneous (one- minute) and 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

3. Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous opacity monitoring system designed to ensure continuous valid and representative readings of opacity. The plan shall include, as a minimum, conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring that sections 7.1.4, 7.4.1, 7.4.2, and Table 1-1 of Performance Specification 1 are maintained on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.

4. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

   The permittee shall collect and record the following information for each day:

   a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

   b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

5. The permittee shall properly install, operate and maintain equipment to continuously monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

   The permittee shall collect and record the following information each day:

   a. The pressure drop across the scrubber, in inches of water, on a daily basis.

   b. The scrubber water flow rate, in gallons per minute, on a daily basis.

   c. The operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

D. **Reporting Requirements**

1. Pursuant to 40 CFR Parts 60.7 and 60.13(h), the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective actions taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

   The permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency documenting any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

   If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

2. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above.

3. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:

   a. The static pressure drop across the scrubber.

   b. The scrubber water flow rate.

E. **Testing Requirements**

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

   a. The emission testing shall be conducted 6 months prior to renewal.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulate.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 5, 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time (s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

2. Compliance with the visible particulate emissions limit shall be demonstrated by the record keeping requirements in C.2.

3. Compliance with the incinerator temperature requirement shall be demonstrated by the record keeping requirements in C.4.

4. Compliance with the scrubber operational restrictions shall be demonstrated by the record keeping requirements in C.5.

5. Compliance with the remaining mass emissions limits shall be demonstrated by the emission factors, control efficiencies (if applicable) and the operational parameters in PTI application 14-1469 as submitted on 12/3/87.

F. **Miscellaneous Requirements**

1. None